

THE HONORABLE TIFFANY M. CARTWRIGHT

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES FIRE INSURANCE  
COMPANY, a Delaware corporation;  
ENDURANCE AMERICAN INSURANCE  
COMPANY, a Delaware corporation;  
NAVIGATORS INSURANCE COMPANY, a  
New York corporation; and AGRICO SALES,  
INC., a Texas corporation,  
Plaintiffs,

vs.

OXBO, INC. d/b/a OXBO MEGA  
TRANSPORT SOLUTIONS, an Oregon  
corporation; and OXBO ENGINEERING,  
LLC, an Oregon limited liability company,

Defendants,

vs.

ALEXANDER GOW, INC., an Oregon  
corporation and a Washington corporation,  
CSL GLOBAL LIMITED d/b/a CSL NORTH  
AMERICA, a Texas corporation, and a  
Louisiana corporation, WESTERN  
TOWBOAT COMPANY, a Washington  
corporation,

Third-Party Defendants.

IN ADMIRALTY

Case No. 3:22-cv-05228-TMC

UNOPPOSED (STIPULATED)  
MOTION TO CONTINUE  
CERTAIN PRE-TRIAL DATES

**AND ORDER**

**JOINT/STIPULATED MOTION  
TO CONTINUE PRETRIAL DEADLINES- 1**  
Case No. 3:22-cv-05228-TMC

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All the parties to this action jointly ask this Honorable Court to continue the following pre-trial deadlines:

Event	Current Deadline	Proposed New Deadline
Expert Reports	October 11, 2023	November 10, 2023
Rebuttal Reports	November 11, 2023	December 11, 2023
Discovery Cutoff	December 11, 2023	January 5, 2024

The trial date and other pre-trial deadlines shall remain unchanged.

This case involves an alleged loss of \$6,314,000.00. See Complaint, Dkt.1, para.

14. Coordinating calendars of the numerous parties has been rather challenging.

Moreover, the case involves complicated issues of contractual disputes, lashing plans for heavy industrial equipment transported on navigable waters, marine engineering, historical weather and other discovery issues. Documents produced in discovery to date are nearing seventy thousand pages, as well as and numerous schematics and calculations.

Thus, this additional time is required to complete depositions necessary for the experts to issue their opinions, and for the parties to gather sufficient information to be able to meaningfully prepare for trial. The continuance is for one month only and will not affect the trial date. The parties and counsel agree the request for continuance does not result from lack of diligence.

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Therefore, the parties respectfully ask that the Scheduling Order be amended to reflect the stipulated deadlines as outlined above.

DATED this 22nd day of September, 2023.

HOLMES WEDDLE & BARCOTT, P.C.

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**JOINT/STIPULATED MOTION  
TO CONTINUE PRETRIAL DEADLINES- 3**  
Case No. 3:22-cv-05228-TMC

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**ORDER**

It is so ordered.

DATE this 25th day of September 2023.



Tiffany M. Cartwright  
United States District Court Judge

**JOINT/STIPULATED MOTION  
TO CONTINUE PRETRIAL DEADLINES- 4**  
Case No. 3:22-cv-05228-TMC

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